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Contractor	BUSHY RUN	RES CTR			
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(COMPLIANCE AUDIT PROGRAM)

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39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001

June 4, 1992

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88928883516

Attn: Section 8(e) Coordinator (CAP Agreement)

Re: CAP Agreement Identification No. 8ECAP-0110

Dear Sir or Madam:

Union Carbide Corporation ("Union Carbide") herewith submits the following report pursuant to the terms of the TSCA §8(e) Compliance Audit Program and Union Carbide's CAP Agreement dated August 14, 1991 (8ECAP-0110). This report describes acute toxicology studies with N,N-dimethylethanolamine (CASRN 108-01-0).

"N,N-Dimethylethanolamine: Primary Skin Irritancy Studies in the Rabbit", Bushy Run Research Center, Project Report 53-23, April 6, 1990.

A complete summary of this report is attached.

Previous TSCA Section 8(e) or "FYI" Submission(s) related to this substance are:

(None)

Previous PMN submissions related to this substance are: (None)

This information is submitted in light of EPA's current guidance. Union Carbide does not necessarily agree that this information reasonably supports the conclusion that the subject chemical presents a substantial risk of injury to health or the environment.

In the attached report the term "CONFIDENTIAL" may appear. This precautionary statement was for internal use at the time of issuance of the report. Confidentiality is hereby waived for purposes of the needs of the Agency in assessing health and safety information. The Agency is advised, however, that the publication rights to the contained information are the property of Union Carbide.

Yours truly,

William C. Kuryla, Ph.D.

Associate Director

Product Safety (203/794-5230)

WCK/cr

Attachment (3 copies of cover letter, summary, and report)

SUMMARY

Project Report 53-23

N.N-Dimethylethanolamine

Primary Skin Irritancy Studies in the Rabbit

Sponsor: Specialty Chemicals Division Union Carbide Corporation

SUMMARY

In previous skin irritancy tests at BRRC, N,N-dimethylethanolamine produced necrosis from 4 hours of occluded contact with 0.5 ml. Therefore, further testing, using 2 periods of occluded contact (one hour, 3 minutes) was conducted.

Skin Irritation, Rabbit (occluded)
One-hour contact: Moderate erythema and edema on 6 of 6 rabbits,
full-thickness necrosis on 6, ulceration on 3, ecchymosis on one and
scabs on 3 from 0.5 ml; severe irritation persisted through 2 days,
at which time all animals were sacrificed for humane reasons.

Three-minute contact: Minor erythema, superficial necrosis and ecchymosis on one of 6 rabbits; desquamation, alopecia and scabs on 2 from 0.5 ml (no irritation observed on 4 animals); desquamation, alopecia and scabs persisted on the 2 effected animals at 14 days.



BUSHY RUN RESEARCH CENTER

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Project Report 53-23 BRRC Number 90-15-11184 5 Pages April 6, 1990

N.N-Dimethylethanolamine

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Sponsor: Specialty Chemicals Division Union Carbide Corporation

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INTERPRETATION

A one-hour application of N,N-dimethylethanolamine to covered rabbit skin resulted in severe irritation, including full-thickness necrosis on 6 of 6 rabbits and ulceration on 3. A 3-minute application of 0.5 ml produced minor to moderate irritation on 2 of 6 animals tested, with superficial (reversible) necrosis on one. Therefore, N,N-dimethylethanolamine was "corrosive" to the skin when tested for one hour but not in the 3-minute test.

SAMPLE

Quantity: Approximately 30 ml

Submitted By: R. A. Gregory (Bound Brook, NJ)

Date Received: December 15, 1989

Division: Specialty Chemicals South Charleston, WV

Identification: TK-200; PC-2911602

UCC Charge No.: 500-566-496500

Description: transparent,

BRRC Sample No.: 52-781

colorless, low viscosity liquid

CAS No.: 108-01-0

Any of the remaining sample will be retained for at least 2 years following issuance of this report.

PROCEDURES

A description of the test procedure is included in the attached standard test procedures section (Appendix 1). One set of 6 rabbits was subjected to a one-hour contact period and a second set of 6 animals was tested for 3 minutes. The sample was dosed as received for the primary skin irritancy tests.

RESULTS

Results of the one-hour skin irritation test are given in Table 1 and the 3-minute contact results appear in Table 2.

A one-hour application of 0.5 ml of N,N-dimethylethanolamine to occluded rabbit skin resulted in moderate crythema and edema on all 6 rabbits. One rabbit had ecchymosis within one hour (after the end of contact). Superficial necrosis was present on 4 rabbits at one hour. Full-thickness necrosis developed on all 6 animals and ulceration developed on 3 within one to 2 days. Scabs were also present on 3 animals at 2 days. At this time, severe irritation persisted on each animal. Therefore, all rabbits were sacrificed for humane reasons.

Following a 3-minute contact period with 0.5 ml of sample on covered skin, minor erythema was produced on one of 6 rabbits (persisting through 3 days). Ecchymosis was apparent on another animal at one hour. Four rabbits had no irritation during the test (2 animals were sacrificed at 7 days). The first affected rabbit developed superficial necrosis by one day. Desquamation, scabs and alopecia were observed on 2 rabbits between 7 and 14 days.

Report 53-23 Page 3

Reviewed and Approved by:

oy C. Hyers, S.S., PABT Date

Darol E. Dodd, Ph.D., DABT Date
Assistant Director

Fred E. Frank, Ph.D. Date

Acknowledgments:

Skin Irritation Tests

Kathleen R. Hufford, AALAS Cert. II Senior Technologist

Mary G. Brawley, HT (ASCP) Master Technologist

WPC/11f/1829Z-1 03-14-90

Table 1

Primary Skin Irritation - Rabbit (One-Hour Contact)

Date:	02-06-90	02-06-90	02-06-90	02-06-90	02-06-90	02-06-90	
Rabbit No.:		90-3009	90-3011	90-1407	90-1411	90-3033	
	Male	Male	Male	Female	Female	Female	
Brythema & Eschar Po	rmation						
Time (After Initiation	Score	Score		Score	Score	Score	Maan San
of Contact): 2 hours	2	2	Score 2	1	1	1	Mean Score
1 day	2	2	2	2	3	3	2.3
2 days	2	2	2	2	2	2	2.0
Edema Formation Time:	Score	Score	Score	Score	Score	Score	Mean Score
2 hours	1		2	1	1	1	1.2
	2	2	3	2	3	3	2.5
1 day							
1 day	2	2	2	. 2	2	2	2.0
2 days Other Irritation or	2	2 Bffect	2 Effect	Bffect	Bffect	Effect	2.0
2 days Other Irritation or	2 Bffects	Bffect N			-		2.0
2 days Other Irritation or Time:	2 Bffects		Effect	Bffect	Effect	Effect	2.0

Specific Effects/Remarks: Rabbits sacrificed at 2 days for humane reasons.

H = superficial necrosis; H+ = full-thickness necrosis; EC = ecchymosis; S = scab formation; U = ulceration

WPC/11f/1829Z-1:03-14-90

Primary Skin Irritation - Rabbit (3-minute Contact)

Date:	01-22-90	01-22-90	02-13-90	02-13-90	02-13-90	02-13-90	
Rabbit No.:		90-88	90-3915	90-3918	90-3630	90-3651	
	Male	Female	Male	Male	Female	Female	
Erythema & Eschar For							
Time (After Initiation		T					
of Contact):	Score	Score	Score	Score	Score	Score	Mean Score
1 hour	0	0	1	0	0	0	0,2
1 day	0	0	1	0	0	0	0.2
2 days	0	0	1	0	0	0	0.2
3 days	0	0	1	0	0	0	0.2
7 days	0	0	0	0	0	0	0.0
10 days	-	-	0	0	0	0	0.0
_14 days	-		0	0	0	0	0.0
Edema Formation							
Time:	Score	Score	Score	Score	Score	Score	Mean Score
1 hour	0	0	0	0	0	0	0.0
1 day	0	0	0	0	0	0	0.0
2 days	0	0	0	0	0	0	0.0
3 days	0	0	0	0	0	0	0.0
7 day	0	0	0	0	0	0	0.0
10 days			0	0	0	0	0.0
14 days	-	-	0	0	0	0	0.0
Other Irritation or	Effects						
Time:	Effect	Effect	Effect	Bffect	Effect	Bffect	
1 hour	None	None	None	None	None	EC	
1 day	None	Mone	N	Mone	None	None	
2 days	None	None	N	None	None	None	
3 days	None	None	N	None	None	None	
7 days	None	None	N,D	None	Mone	S	
10 days	-	-	D.AL.S	None	None	S	
14 days		-	D.AL.S	None	None	D.AL.S	
Specific Effects/Rema		10 1 00	-161 and after 7	dave because of	housing limit		W-1

Report 53-23 Page 5

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